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December 18, 2018

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**JOINT APPLICATION  
TO EXTEND DEADLINE FOR  
OBJECTIONS TO REPORT AND  
RECOMMENDATION**

**Re: Sea Trade Maritime Corp., et al. v. Coutsodontis, et al.  
Civil No. 09-488 (LGS) (HBP)**

Dear Judge Schofield:

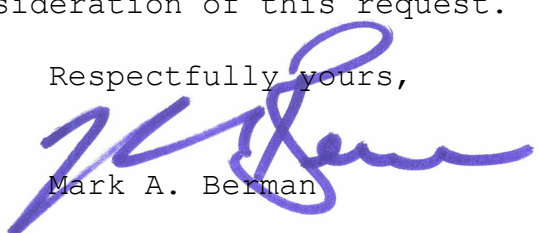
Objections to Judge Pitman's Report and Recommendation are due on December 21, 2018. Please accept this letter in lieu of a more formal joint motion requesting an extension of the deadline to file objections to January 21, 2019 and any responses to the objections to February 20, 2019. In addition to the upcoming holidays, the basis of this request is as follows:

- (1) I have two opposition briefs due this week in a matter pending in New York Supreme Court;
- (2) I have a Third Circuit brief on appeal due on December 28, 2018; and
- (3) I have a multiple-party jury trial commencing on January 8, 2019 in Atlantic City, New Jersey.

Plaintiffs' counsel joins in this request.

Thank you for your kind consideration of this request.

Respectfully yours,

  
Mark A. Berman

cc: All Counsel of Record (via ECF)